UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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SHAKILLA ASIF,   Civil Action No:
                                                        11-2895(JBW)(JO)
                            Plaintiff,

                                                        STIPULATION
        -against-

TARGET STORES, INC.,

                            Defendant.

- X

IT IS HEREBY STIPULATED AND AGREED, by and between SHESTACK
& YOUNG, LLP, attorneys for plaintiff and SIMMONS JANNACE, LLP,
attorneys for defendant TARGET CORPORATION s/h/a TARGET STORES,
INC. ("TARGET"), that the plaintiff's damages, including but not
limited to, pain and suffering, personal injury, medical
expenses, loss of earnings and/or any other special damages
relating to the alleged accident of May 10, 2009, which forms
the basis of this lawsuit, shall not exceed the sum of
SEVENTY-FIVE THOUSAND DOLLARS ($75,000.00), and that plaintiff
shall hold Target harmless from any and all liens, expenses,
costs, fees or other obligations, concerning, associated with or
relating to plaintiff's care and treatment, medical or
otherwise, and any related damages, now known or unknown,
existing currently, or which may arise in the future as a result
of the claims arising from the above-captioned matter, and that
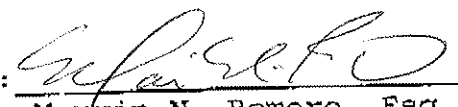any claim for damages contained in plaintiff's Complaint is

hereby forever reduced to the sum of SEVENTY-FIVE THOUSAND

DOLLARS ($75,000.00).

IT IS HEREBY FURTHER STIPULATED AND AGREED that in exchange

for the above, Target hereby consents to the remand of this

matter from the United States District Court to the Supreme

Court of the State of New York, County of Queens.
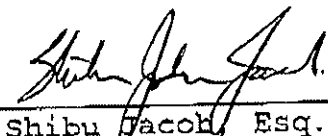
IT IS HEREBY FURTHER STIPULATED AND AGREED, a facsimile

copy of this Stipulation shall be deemed an original.

Dated   Syosset, New York
          June 30, 2011

SIMMONS JANNACE, LLP   SHESTACK & YOUNG, LLP
Attorneys for Defendant   Attorneys for Plaintiff
TARGET CORPORATION s/h/a   SHAKILLA ASIF
TARGET STORES, INC.

By: By:
    Marvin N. Romero, Esq.   Shibu Jacob, Esq. (SJ-7383)
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